

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

STENIO and RAQUEL DESOUZA,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	CIVIL ACTION NO. 05-787
J.N. CARPENTRY, INC., et al.,	:	
	:	
Defendants.	:	
	:	

**ANSWER OF DEFENDANT J.N. CARPENTRY, INC., TO CROSSCLAIM AGAINST
CO-DEFENDANTS OF DEFENDANT LANDMARK ENGINEERING, INC.**

Defendant, J.N. Carpentry, Inc., by and through its attorneys, Wright & O'Donnell, P.C., answer the Crossclaim of Co-Defendant Landmark Engineering, Inc., and state:

1. Denied. This Answering Co-Defendant is without sufficient knowledge or information to form a belief as to the truth or falsity of this paragraph of Co-Defendant Landmark Engineering, Inc.'s, Crossclaim and, therefore, said allegations are denied and strict proof thereof is demanded at time of trial.
2. Denied. The allegations of this paragraph of Co-Defendant Landmark Engineering, Inc.'s, Crossclaim are denied as conclusions of fact and/or law, which are deemed to be at issue pursuant to the pertinent Rules of Civil Procedure, and for which strict proof thereof is demanded at time of trial.

WHEREFORE, Defendant J.N. Carpentry, Inc., denies that it is liable to Co-Defendant Landmark Engineering, Inc., for contribution and/or common law and/or contractual indemnification, and demands judgment in its favor, together with all recoverable fees, costs and expenses.

By:

/s/ George T. McCool, Jr.

George T. McCool, Jr.
Admitted Pro Hac Vice
WRIGHT & O'DONNELL
15 East Ridge Pike, Suit 570
Conshohocken, PA 19428
Telephone: (610) 940-4092
E-mail: gmccool@wright-odonnell.com
Attorneys for Defendant JN Carpentry, Inc.

and

/s/ Armand J. Della Porta

Armand J. Della Porta, Esquire
Delaware ID No. 2861
Eric S. Thompson, Esquire
Delaware ID No. 4633
Marshall, Dennehey, Warner, Coleman
and Goggin
1220 North Market Street
Post Office Box 8888
Wilmington, DE 19899
Telephone: (302) 552-4323
E-mail: ajdellaporta@mdwcg.com
Attorneys for Defendant JN Carpentry, Inc.

CERTIFICATE OF SERVICE

I, George T. McCool, Jr., Esquire, hereby certify that a true and correct copy of the foregoing Answer of Defendant J.N. Carpentry, Inc., to Crossclaim against Co-Defendants of Defendant Landmark Engineering, Inc., was served upon the below listed counsel of record via electronic filing and/or regular mail:

Gary W. Aber, Esquire
Aber, Goldlust, Baker & Over
First Federal Plaza, Suite 600
P.O. Box 1675
Wilmington, DE 19899
Counsel for Plaintiffs

Arthur Bugay, Esquire
Galfand Berger, LLP
1818 Market Street, Suite 1818
Philadelphia, PA 19103
Counsel for Plaintiffs

Norman H. Brooks, Jr., Esquire
Marks, O'Neill, O'Brien & Courtney, P.C.
913 North Market Street, Suite 800
Wilmington, DE 19801
*Counsel for Defendants Pettinaro Construction Co., Inc.,
Pettinaro & Associates, Inc., Pettinaro Enterprises, Pettinaro Enterprises LLC
and Pettinaro Relocation LLC*

Paul Cottrell, Esquire
Tighe, Cottrell & Logan, P.A.
First Federal Plaza, Suite 500
P.O. Box 1031
Wilmington, DE 19899
Counsel for Landmark Engineering, Inc.

Robert Daniel Ardizzi, Esquire
Davis, Bucco & Ardizzi
2 North Colonial Avenue
Elsmere, DE 19805
Counsel for Landmark Engineering, Inc.

Herbert W. Mondros, Esquire
Jeffrey K. Martin, Esquire
Margolis Edelstein
750 South Madison Street, Suite 102
Wilmington, DE 19801
Counsel for U.S. Construction Inc. a/k/a
U.S. Construction a/k/a U.S. Construction LLC

Brian J. Chapman, Esquire
Kent & McBride, P.C.
1105 Market Street, Suite 500
Wilmington, DE 19801
Counsel for Mid-Atlantic Realty and Queensbury Village

/s/ **George T. McCool, Jr.**